

FILED UNDER SEAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

VLADIMIR DUNAEV,

Defendant.

FILED

MAY 22 2023

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

CASE NO.: 1:20-CR- 00440

JUDGE SOLOMON OLIVER, JR.

MOTION TO REQUIRE GOVERNMENT TO
SPECIFICALLY IDENTIFY ALL EVIDENCE
AND EXHIBITS IT INTENDS TO UTILIZE
DURING ITS CASE IN CHIEF AT TRIAL

Defendant Vladimir Dunaev herein respectfully moves this Honorable Court to issue an Order requiring the Government to specifically identify all evidence and exhibits it intends to utilize during the presentation of its case-in-chief at trial, and to further identify the location of such evidence and exhibits within the voluminous discovery provided to the defense. The within Motion seeks the requested information be provided as soon as possible to better enable the defense to properly prepare for trial.

The within Motion is submitted in good faith based upon the massive amount of discovery produced by the Government, much of which cannot be accessed without the technical skill of experts and the use of sophisticated computer programs.

Respectfully submitted,



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CERTIFICATE OF SERVICE

This is to certify that the foregoing was filed by hand with the Clerk of Courts, on the 22nd day of May 2023, and was also hand-delivered on the same date to Daniel Riedl, Esq. and Duncan Brown, Esq., c/o the Office of the United States Attorney for the Northern District of Ohio, 801 West Superior Avenue, Suite 400, Cleveland, Ohio 44113-1852.



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